

ESTTA Tracking number: **ESTTA753142**

Filing date: **06/17/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

|                        |   |
|------------------------|---|
| Proceeding             | 92063431  |
| Party                  | Plaintiff<br>OMH, Inc. and Creative Artists Agency LLC  |
| Correspondence Address | MONICA B RICHMAN<br>DENTONS US LLP<br>P O BOX #061080, WACKER DRIVE STATION WILLIS TOWER<br>CHICAGO, IL 60606-1080<br>UNITED STATES<br>trade-<br>marks.us@dentons.com,derek.morales@dentons.com,ian.farias@dentons.com,<br>monica.richman@dentons.com |
| Submission             | Motion for Default Judgment   |
| Filer's Name           | Monica B. Richman   |
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| Signature              | /monica b. richman/   |
| Date                   | 06/17/2016  |
| Attachments            | Motion for Default Judgment.pdf(482422 bytes )  |

|  |   |                           |
|--|---|---------------------------|
| OMH, Inc. and Creative Artists Agency, LLC | ) |                           |
| Petitioners,                               | ) |                           |
|  | ) |                           |
| v.   | ) | Cancellation No. 92063431 |
|  | ) |                           |
|  | ) |                           |
| CAA Intl Group, Inc. dba CAA Intl Corp.    | ) |                           |
| Registrant.                                | ) |                           |
|  | ) |                           |
|  | ) |                           |



CAA

## **PETITIONERS' MOTION FOR ENTRY OF DEFAULT JUDGMENT**

1. Petitioners believe that they will be damaged by the above identified registration, petition to cancel the same, and filed a Petition for Cancellation to same on March 29, 2016.
2. The Petition for Cancellation was served on Respondent by Petitioners by first-class mail to the address of record on March 29, 2016. On March 30, 2016, the Trademark Trial and Appeal Board (TTAB) issued its scheduling order, setting a deadline for Respondent to Answer the Petition for Cancellation by May 9, 2016.

3. On or about April 21, 2016, the service copy of the Petition for Cancellation was returned to Petitioners' Attorneys as "undeliverable," and on April 27, 2016 Petitioners filed a Notice of Returned Service Copy of Petition for Cancellation with the TTAB. On May 3, 2016, the TTAB obtained an alternate address for Respondent, remailed the Petition for Cancellation, and issued a new scheduling order, setting a deadline for Respondent to Answer the Petition for Cancellation by June 12, 2016.
4. Respondent has not filed an Answer or other responsive pleading, nor did Respondent request an extension of time to file an Answer at any time on or before the June 12, 2016 deadline to Answer.
5. Respondent is in default for failure to timely file an Answer and/or failure to timely seek an additional extension of time in which to do so. Therefore, the allegations of Petitioners' Petition for Cancellation are deemed to be admitted, and Petitioners are entitled to judgment on their Cancellation.
6. Accordingly, Petitioners respectfully request that the TTAB enter a Judgment of Default against Respondent and cancel U.S. Registration Number 4,338,209.

Respectfully submitted,

OMH, INC. and  
CREATIVE ARTISTS AGENCY, LLC

Dated: June 17, 2016

By: /s/ Monica B. Richman/  
Monica B. Richman, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing PETITIONERS' MOTION FOR ENTRY OF DEFAULT JUDGMENT to be served upon the address of record for Respondent and the alternate address for Respondent provided by the TTAB, namely:

CAA INTL GROUP INC DBA CAA INTL CORP  
P O BOX 93871  
LAS VEGAS, NV 89193

- AND -

CAA INTL GROUP INC DBA CAA INTL CORP.  
3641 HAMMOCK ST  
LAS VEGAS NV 89147-3756

by placing same in an envelope, properly sealed and addressed, with postage prepaid and depositing same with the United States Postal Service on this June 17, 2016.

/s/ /j. ian farias/  
J. Ian Farias

Filed with the TTAB via  
ESTTA on June 17, 2016